

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION

PHARMMD SOLUTIONS, LLC,

Plaintiff,

v.

PERFORMRX, LLC and
DENISE KEHOE,

Defendants.

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Case No. 3:11-CV-00255

Judge Haynes

*Op. 12/21/11
This motion
is DENIED*

**DEFENDANTS' MOTION FOR LEAVE TO FILE A REPLY MEMORANDUM
IN SUPPORT OF THEIR MOTION TO DISMISS, OR IN THE ALTERNATIVE
TO TRANSFER VENUE**

[Signature]
7870
4-15-1

Pursuant to Local Rule 7.01(b), Defendants PerformRx and Denise Kehoe (“Kehoe”) respectfully move this Court for leave to file a Reply Memorandum in Support of their Motion to Dismiss, or in the Alternative to Transfer Venue, attached hereto as Exhibit A.

As discussed in the accompanying Reply Memorandum, Plaintiff PharmMD Solutions, LLC’s (“Plaintiff”) arguments fail because, *inter alia*, this Court lacks both general and specific personal jurisdiction over PerformRx based on the controlling principles of law articulated by the Supreme Court and the Sixth Circuit. Furthermore, in light of the fact that almost all of the possible witnesses in this case are located in Pennsylvania or nearby on the East Coast, the Eastern District of Pennsylvania is a more appropriate venue for this case.

Thus, Plaintiff’s Complaint should be dismissed, or in the alternative, transferred to the more appropriate venue in the Eastern District of Pennsylvania.